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P.O. Box 1002, Glen Rose, Texas 76043

Ref: ET Docket No. 05-345

STARS-06001

January 17, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON NUCLEAR ENERGY INSTITUTE AND UNITED
TELCOM COUNCIL REQUEST FOR WAIVER OF SECTION 74.832(h)
(ET Docket No. 05-345)**

Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants support the request for waiver of the eligibility rules for Low Power Auxiliary Stations (Part 74, Subpart H) filed jointly by Nuclear Energy Institute (NEI) and United Telecom Council (UTC). This request permits the continued operation of certain wireless headsets and intercom devices at nuclear power plants. This request is in the best interest of the public because it enhances worker safety and contributes to safe operation of nuclear power plants that use this equipment.

Communication is essential to the safe and efficient performance of a number of complex tasks during refueling and maintenance of nuclear power plants. Fuel handling operations, overhead crane operations, and maintenance activities in high radiation fields are just a few of the tasks requiring dependable communications. The following performance criteria are used to judge system performance.

Hands-free operation
Uninterrupted voice transmission (no drop)
Full-duplex
High Fidelity clarity audio

¹ STARS is an alliance of six plants (eleven nuclear units) operated by TXU Power, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company and Arizona Public Service Company.

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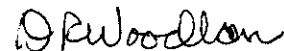
Contributes to ALARA (Regulatory Requirement limiting an individual's radiation exposure to As Low As Reasonably Achievable)
Avoidance of inadvertent actuation
Multi-user
Wireless
Background noise rejection
Moisture resistance
Durability
Ease/simplicity of use

The current selection of Telex equipment meets the exacting standards established for the challenging nuclear environment. STARS is aware of no other equipment that meets all of the above criteria.

There is no evidence that the use of the Telex equipment at nuclear power plants will cause any interference to eligible users' transmissions during operations.

STARS appreciates the opportunity to provide comments in support of the waiver and is available to answer questions concerning past or planned telecommunications equipment use. I can be contacted at 254-897-6887 or dwoodl1@txu.com.

Very truly yours,



D. R. Woodlan, Chairman
Integrated Regulatory Affairs Group
STARS